

Mr. Michael Stephenson  
20<sup>th</sup> Century Fiberglass, Inc. Plant 1  
1131 D.I. Drive  
Elkhart, Indiana 46517

Re: 039-16138  
Second Administrative Amendment to  
Part 70 039-7437-00076

Dear Mr. Stephenson:

20<sup>th</sup> Century Fiberglass, Inc. Plant 1 was issued a Part 70 permit on June 25, 1999 for a stationary fiberglass component manufacturing operation. A letter requesting a change in the permit was received on September 20, 2002. The changes qualify as "revisions to descriptive information where the revision will not trigger a new applicable requirement or violate a permit term", under 326 IAC 2-7-11. Therefore, the permit is hereby administratively amended as follows (changes are **bolded** and deletions are ~~struck through~~ for emphasis):

Request 1: During the course of review, additional insignificant activities were identified by the source and requests that these activities be detailed in the Part 70 Permit. These activities are identified in the enclosed GSD 10(a) Form.

Reply 1: Section A.3 only identifies activities or emission units which are specifically regulated, as defined in 326 IAC 2-7-1(21). However, the source Part 70 as written included all insignificant activities which are not specifically regulated. To be consistent the additional activities identified by the source will be added in Section A.3 as requested. See additional changes to this section in Reply 3 and Reply 4.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.
- (2) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
  - (a) One (1) adhesive booth
- (3) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment .
- (4) Paved and unpaved roads and parking lots with public access.
- (5) Other activities of categories not previously identified:

Insignificant Thresholds: Activities with emissions equal to or less than thresholds require listing only

Lead (Pb) = 0.6ton/year or 3.29 lbs/day

Sulfur Dioxide (SO<sub>2</sub>) = 5 lbs/hour or 25 lbs/day

Nitrogen Oxides (NO<sub>x</sub>) = 5 lbs/hour or 25 lbs/day

Carbon Monoxide (CO) = 25 lbs/day

Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day

Volatile Organic Compounds = 3 lbs/hour or 15 lbs/day

- (a) One (1) combination booth (sanding operations, saw dust collectors)
  - (b) Touch up painting
  - (c) Waxing of molds
  - (d) Twelve (12) hand grinders
  - (e) Six (6) water cutters
  - (f) **Two (2) 6,000 capacity unsaturated polyester resin storage tanks**
  - (g) **Two (2) 300 gallon capacity shear mixing tanks used to mix unsaturated polyester resin and calcium carbonate**
  - (h) **One (1) 1,500 gallon capacity acetone storage tank**
  - (i) **One (1) adhesive application spray area with two (2) stations to apply adhesive to tonneau covers**
  - (j) **One (1) corrugating station used to hand cut cardboard and fiberglass mat for hand and spray lay-up operations and the bandsaw cutting of aluminum**
  - (k) **One (1) gelcoat storage and mixing room**
  - (l) **Less than 90 day storage of hazardous wastes containing VOC's and HAPs in closed containers**
  - (m) **Metal strip cutting operation**
  - (n) **Mold repair and maintenance operations**
  - (o) **Aluminum truck cap painting**
- (6) **Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000, 000) Btu per hour.**
- (a) **One (1) propane-fired shrink wrap heat gun.**
- (7) **A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.**
- (a) **One (1) 300 gallon capacity diesel fuel storage tank.**
- (8) **Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.**
- (a) **Air tool maintenance**
  - (b) **Compressor maintenance**
- (9) **Solvent recycling systems with batch capacity less than or equal to 100 gallons.**
- (a) **One (1) acetone recycling machine**
- (10) **Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.**
- (11) **Blowdown for any of the following: sight glass; boiler; compressors, pumps and cooling tower**
- (a) **Blowdown for compressors**

- (12) **Grinding and machining operations controlled with filters scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grain per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.**
- (a) **Tonneau assembly area:**
- (A) **Miscellaneous woodworking operations to cut shipping mounting boards**
- (B) **One (1) combination grinding booth**
- (b) **Main glass plant:**
- (A) **One (1) combination grinding booth**
- (B) **Miscellaneous woodworking operations to cut shipping mounting boards**
- (c) **Paint building - Paint preparation scuff sanding room.**
- (13) **Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).**
- (a) **Main glass plant - Mold maintenance activities**
- (14) **A laboratory as defined in 326 IAC 2-7-1(20)(C)**
- (a) **One (1) gelcoat and resin QA/QC laboratory**

Request 2: Please update/modify the language of the following permit sections as detailed in Section A.2 and the corresponding descriptions in Section D.1.

- (a) Section A.2, item (1) - Please revise to read:  
"One (1) paint/clear coat booth with one (1) air-assisted airless gun for clear coating and one (1) HVLP gun for painting, and the associated solvent cleaning and coating mixing operations, identified as Paint/Clear Booth # 3, with a maximum capacity of 41.4 pounds of VOC per hour, using dry filters to control particulate matter emissions, exhausting to two (2) stacks, with one (1) cure oven exhausting to one (1) stack."
- (b) Section A.2, item (2) - Please revise to read:  
"One (1) paint/clear coat booth with one (1) air-assisted airless gun for clear coating, and the associated solvent cleaning and coat mixing operations, identified as Paint/Clear Booth # 4, with a maximum capacity of 41.4 pounds of VOC per hour, using dry filters to control particulate matter emissions, exhausting to one (1) stack, with one (1) cure oven exhausting to one (1) stack."
- (c) Section A.2, item (3) - Please revise to read:  
"Two (2) spray booths identified as Spray Booth # 1 and Spray Booth # 2 each equipped with one (1) HVLP spray gun for painting, and the associated solvent cleaning and coating mixing operations, each with a maximum capacity 41.4 pounds of VOC per hour, each using dry filters to control particulate matter emissions and each exhausting to one (1) stack."
- (d) Section A.2, item (4) - Please be advised of the following: The source original

operating permit number 039-0076-0695 issued on December 31, 1990 had included two (2) fiberglass chopping booths each with a capacity to consume 437 pounds of "neat resin" per hour. The current Part 70 Permit lists only one (1) chop booth with no reference to the second booth and associated spray equipment/application operations. The source currently operates one (1) chop booth and one (1) ledge lamination area each equipped with one (1) non-atomizing resin applicator and hand lay-up operations. The resin applicator from the second booth was moved to the ledge laminating area.

Additionally, the stated maximum capacity of 437 pounds per hour is stated as "pounds of fiberglass chop" in Section A.2 and "pounds of fiberglass molds" in Section D.1. This capacity should be for "neat resin". Therefore, item (4) should be changed as follows:

"One (1) chop booth equipped with one (1) non-atomizing resin applicator and hand lay-up operations and the associated solvent cleaning operations, identified as the Main Glass Plant Chop Booth, with a maximum capacity to apply 437 pounds of neat resin per hour, using dry filters to control particulate matter emissions, and exhausting to two (2) stacks.

The ledge lamination area consisting of multiple ledge stations, one (1) non-atomizing resin applicator and hand lay-up operations and the associated solvent cleaning operations with a maximum capacity to apply 437 pounds of neat resin per hour with fugitive emissions."

- (e) Section A.2, item (5) - Please revise to read:  
"One (1) gelcoat booth equipped with one (1) air assisted applicator and the associated solvent cleaning operations, identified as the Main Glass Plant Gel Coat Booth, with a maximum capacity to coat 118 pounds of fiberglass gel coat per hour, using dry filters to control particulate matter emissions, and exhausting to one (1) stack."
- (f) Item (6) - Section A.2 and D.1 please add the phrase " and the associated solvent cleanup operations", to the language in the existing sections.

Reply 2: Section A.2 will be re-worded as suggested and changes will also be reflected to Section D. Amendment is as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]  
[326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

- (1) ~~One (1) paint/clear coat booth with one (1) air-assisted airless gun for clear coating and one (1) HVLP gun for painting, identified as Paint/Clear Booth #3, with a maximum capacity of 41.4 pounds of VOC per hour, using dry filters to control particulate matter emissions, and exhausting to two (2) stacks.~~

**One (1) paint/clear coat booth with one (1) air-assisted airless gun for clear coating and one (1) HVLP gun for painting, and the associated solvent cleaning and coating mixing operations, identified as Paint/Clear Booth # 3, with a maximum capacity of 41.4 pounds of VOC per hour, using dry filters to control particulate matter emissions, exhausting to two (2) stacks, with one (1) cure oven**

**exhausting to one (1) stack.**

- (2) ~~One (1) air-assisted airless clear coat booth, identified as Paint/Clear Booth #4, with a maximum capacity of 41.4 pounds of VOC per hour, using dry filters to control particulate matter emissions, exhausting to one (1) stack in the booth, with one (1) cure oven exhausting to one (1) stack.~~  
**One (1) paint/clear coat booth with one (1) air-assisted airless gun for clear coating, and the associated solvent cleaning and coating mixing operations, identified as Paint/Clear Booth # 4, with a maximum capacity of 41.4 pounds of VOC per hour, using dry filters to control particulate matter emissions, exhausting to one (1) stack, with one (1) cure oven exhausting to one (1) stack.**
- (3) ~~Two (2) HVLP spray booths, identified as Spray Booth #1 and Spray Booth #2, each with a maximum capacity of 41.4 pounds of VOC per hour, each using dry filters to control particulate matter emissions, and each exhausting to one (1) stack.~~  
**Two (2) spray booths identified as Spray Booth # 1 and Spray Booth # 2 each equipped with one (1) HVLP spray gun for painting, and the associated solvent cleaning and coating mixing operations, each with a maximum capacity 41.4 pounds of VOC per hour, each using dry filters to control particulate matter emissions and each exhausting to one (1) stack.**
- (4) ~~One (1) chop booth, identified as Main Glass Plant Chop Booth, with a maximum capacity to laminate 437 pounds of fiberglass chop per hour, using dry filters to control particulate matter emissions, exhausting to two (2) stacks.~~  
**One (1) chop booth equipped with one (1) non-atomizing resin applicator and hand lay-up operations and the associated solvent cleaning operations, identified as the Main Glass Plant Chop Booth, with a maximum capacity to apply 437 pounds of neat resin per hour, using dry filters to control particulate matter emissions, and exhausting to two (2) stacks.**
- The ledge lamination area consisting of multiple ledge stations, one (1) non-atomizing resin applicator and hand lay-up operations and the associated solvent cleaning operations with a maximum capacity to apply 437 pounds of neat resin per hour with fugitive emissions.**
- (5) ~~One (1) gel coat booth, identified as Main Glass Plant Gel Coat Booth, with a maximum capacity to coat 118 pounds of fiberglass gel coat per hour, using dry filters to control particulate matter emissions, exhausting to one (1) stack.~~  
**One (1) gelcoat booth equipped with one (1) air assisted applicator and the associated solvent cleaning operations, identified as the Main Glass Plant Gel Coat Booth, with a maximum capacity to coat 118 pounds of fiberglass gel coat per hour, using dry filters to control particulate matter emissions, and exhausting to one (1) stack.**

- (6) One (1) gel coat booth identified as Research and Development Gel Coat Booth **and the associated solvent cleanup operations**, using dry filters to control particulate matter emissions, and exhausting to one (1) fan. And one (1) chop booth identified as Research and Development Chop Booth **and the associated solvent cleaning operations**, using dry filters to control particulate matter emissions and exhausting to one (1) fan.
- (7) **Fiberglass truck cap adhesive application, identified as Adhesive Booth C with a maximum usage of 1.0 gallon of adhesive per hour using air-assisted airless spray system, with dry filters to control the particulate matter overspray emissions.**

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (1) ~~One (1) paint/clear coat booth with one (1) air-assisted airless gun for clear coating and one (1) HVLP gun for painting, identified as Paint/Clear Booth #3, with a maximum capacity of 41.4 pounds of VOC per hour, using dry filters to control particulate matter emissions, and exhausting to two (2) stacks.~~

**One (1) paint/clear coat booth with one (1) air-assisted airless gun for clear coating and one (1) HVLP gun for painting, and the associated solvent cleaning and coating mixing operations, identified as Paint/Clear Booth # 3, with a maximum capacity of 41.4 pounds of VOC per hour, using dry filters to control particulate matter emissions, exhausting to two (2) stacks, with one (1) cure oven exhausting to one (1) stack.**

- (2) ~~One (1) air-assisted airless clear coat booth, identified as Paint/Clear Booth #4, with a maximum capacity of 41.4 pounds of VOC per hour, using dry filters to control particulate matter emissions, exhausting to one (1) stack in the booth, with one (1) cure oven exhausting to one (1) stack.~~

**One (1) paint/clear coat booth with one (1) air-assisted airless gun for clear coating, and the associated solvent cleaning and coating mixing operations, identified as Paint/Clear Booth # 4, with a maximum capacity of 41.4 pounds of VOC per hour, using dry filters to control particulate matter emissions, exhausting to one (1) stack, with one (1) cure oven exhausting to one (1) stack.**

- (3) ~~Two (2) HVLP spray booths, identified as Spray Booth #1 and Spray Booth #2, each with a maximum capacity of 41.4 pounds of VOC per hour, each using dry filters to control particulate matter emissions, and each exhausting to one (1) stack.~~

**Two (2) spray booths identified as Spray Booth # 1 and Spray Booth # 2 each equipped with one (1) HVLP spray gun for painting, and the associated solvent cleaning and coating mixing operations, each with a maximum capacity 41.4 pounds of VOC per hour, each using dry filters to control particulate matter emissions and each exhausting to one (1) stack.**

- (4) ~~One (1) chop booth, identified as Main Glass Plant Chop Booth, with a maximum capacity to laminate 437 pounds of fiberglass chop per hour, using dry filters to control particulate matter emissions, exhausting to two (2) stacks.~~

**One (1) chop booth equipped with one (1) non-atomizing resin applicator and hand lay-up operations and the associated solvent cleaning operations, identified as the Main Glass Plant Chop Booth, with a maximum capacity to apply 437 pounds of neat resin per hour, using dry filters to control particulate matter emissions, and exhausting to two (2) stacks.**

**The ledge lamination area consisting of multiple ledge stations, one (1) non-atomizing resin applicator and hand lay-up operations and the associated solvent cleaning operations with a maximum capacity to apply 437 pounds of neat resin per hour with fugitive emissions.**

- (5) ~~One (1) gel coat booth, identified as Main Glass Plant Gel Coat Booth, with a maximum capacity to coat 118 pounds of fiberglass gel coat per hour, using dry filters to control particulate matter emissions, exhausting to one (1) stack.~~  
**One (1) gelcoat booth equipped with one (1) air assisted applicator and the associated solvent cleaning operations, identified as the Main Glass Plant Gel Coat Booth, with a maximum capacity to coat 118 pounds of fiberglass gel coat per hour, using dry filters to control particulate matter emissions, and exhausting to one (1) stack.**
- (6) One (1) gel coat booth identified as Research and Development Gel Coat Booth **and the associated solvent cleanup operations**, using dry filters to control particulate matter emissions, and exhausting to one (1) fan. And one (1) chop booth identified as Research and Development Chop Booth and the associated solvent cleaning operations, using dry filters to control particulate matter emissions and exhausting to one (1) fan.
- (7) **Fiberglass truck cap adhesive application, identified as Adhesive Booth C with a maximum usage of 1.0 gallon of adhesive per hour using air-assisted airless spray system, with dry filters to control the particulate matter overspray emissions.**
- INSIGNIFICANT ACTIVITIES:**
- (2) ~~One (1) adhesive booth~~ **Tonneau cover adhesive application, identified as Adhesive Booth T with a maximum usage of 0.20 gallon per hour, using air-assisted airless spray system.**
- (5) (a) One (1) combination booth (sanding operations and saw dust collectors)

Request 3: Please update/modify the language of the following permit sections as detailed in Section A.3.

- (1) Item (5)(d) - Twelve (12) hand grinders - Please change the language to read: "Periodic grinding and sanding operations related to the incidental repair and preparation of units for other significantly permitted activities."
- (2) Item (5)(e) - Please change the number of water cutters to one (1).

Reply 3: Section A.3 will be amended as follows. See additional changes to this section in Reply 1 and Reply 4:

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.
- (2) ~~Water based adhesives that are less than or equal to 5% by volume of VOCs excluding~~



~~HAPs:~~

- (a) ~~One (1) adhesive booth~~ **Tonneau cover adhesive application, identified as Adhesive Booth T with a maximum usage of 0.20 gallon per hour, using air-assisted airless spray system.**

- (3) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment .
- (4) Paved and unpaved roads and parking lots with public access.
- (5) Other activities of categories not previously identified:

Insignificant Thresholds: Activities with emissions equal to or less than thresholds require listing only

Lead (Pb) = 0.6ton/year or 3.29 lbs/day	Carbon Monoxide (CO) = 25 lbs/day
Sulfur Dioxide (SO <sub>2</sub> ) = 5 lbs/hour or 25 lbs/day	Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day
Nitrogen Oxides (NO <sub>x</sub> ) = 5 lbs/hour or 25 lbs/day	Volatile Organic Compounds = 3 lbs/hour or 15 lbs/day

- (a) One (1) combination booth (sanding operations, saw dust collectors)
- (b) Touch up painting
- (c) Waxing of molds
- (d) ~~Twelve (12) hand grinders~~ **Periodic grinding and sanding operations related to the incidental repair and preparation of units for other significantly permitted activities**
- (e) ~~Six (6)~~ **One (1) water cutters**

Request 4: In Section A.3 item (2) - Adhesive is used to install headliners into fiberglass truck covers and tonneau covers. For health and safety reasons the source has changed the adhesive from a Methylene Chloride based material into a VOC based material. Please find the enclosed PI-19 for the truck cover facility as it is currently conducted. The tonneau cover headliner facility is an insignificant activity. Please change the Part 70 permit to reflect this change.

Reply 4: The previous application of Methylene Chloride based adhesive to fiberglass truck caps emitted Methylene Chloride at 13.6 tons per year. With the change in material into VOC based, the fiberglass truck caps adhesive application emits 11.78 tons per year. Therefore, this facility will not be considered as an insignificant activity, and therefore will be added in Section A.2, and numbered as item (7). However, the tonneau cover adhesive application will remain an insignificant activity. The amendment is as follows:

- (a) Section A.2, item (7):
- (7) **Fiberglass truck cap adhesive application, identified as Adhesive Booth C with a maximum usage of 1.0 gallon of adhesive per hour using air-assisted airless spray system, with dry filters to control the particulate matter overspray emissions.**
- (b) As a result to the change to Section A.2(7), Condition D.1.2 will be amended to include the following condition for the fiberglass truck cap adhesive application, and be numbered as D.1.2(f).

**D.1.2(f) The fiberglass truck cap adhesive application has a potential VOC emissions of less than 25 tons per year. Therefore, 326 IAC 8-1-6 (General Reduction Requirements) is not applicable. However, any change or modification which may increase potential VOC emissions to 25 tons per year or more shall be subject to 326 IAC 8-1-6, and must be approved by the Office of Air Quality before such change may occur.**

(c) Section A.3, item (2) is amended as follows:

(2) ~~Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.~~

~~(a)~~ **One (1) adhesive booth Tonneau cover adhesive application, identified as Adhesive Booth T with a maximum usage of 0.20 gallon per hour, using air-assisted airless spray system.**

All conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman, at (800) 451-6027, press 0 and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments

APD

cc: File - Elkhart County  
U.S. EPA, Region V  
Elkhart County Health Department  
Northern Regional Office  
Air Compliance Section Inspector - Greg Wingstrom, Paul Karkiewicz  
Compliance Data Section - Karen Nowak  
Administrative and Development  
Technical Support and Modeling - Michele Boner

# **PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY**

**20<sup>th</sup> Century Fiberglass, Inc.  
1131 D.I. Drive  
Elkhart, Indiana 46517**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-7437-00076	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: January 15, 1999
First Administrative Amendment No.: 039-13842, issued on February 22, 2001 First Reopening No.: 039-13207, issued January 16, 2002	
Second Administrative Amendment No.: 039-16138	Pages Affected: 4, 5, 29 Pages Added, 4, 5, 5a, 29a, 29b
Issued by:Original signed by Paul Dubenetzky  Paul Dubenetzky, Chief Permit Branch Office Of Air Quality	Issuance Date :October 17, 2002

## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates a stationary fiberglass component manufacturing operation.

Responsible Official: Michael Stephenson  
Source Address: 1131 D.I. Drive, Elkhart, Indiana, 46517  
Mailing Address: 1131 D.I. Drive, Elkhart, Indiana, 46517  
SIC Code: 3089, 3792  
County Location: Elkhart  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Minor Source, under PSD  
Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

---

This stationary source consists of the following emission units and pollution control devices:

- (1) One (1) paint/clear coat booth with one (1) air-assisted airless gun for clear coating and one (1) HVLP gun for painting, and the associated solvent cleaning and coating mixing operations, identified as Paint/Clear Booth # 3, with a maximum capacity of 41.4 pounds of VOC per hour, using dry filters to control particulate matter emissions, exhausting to two (2) stacks, with one (1) cure oven exhausting to one (1) stack.
- (2) One (1) paint/clear coat booth with one (1) air-assisted airless gun for clear coating, and the associated solvent cleaning and coating mixing operations, identified as Paint/Clear Booth # 4, with a maximum capacity of 41.4 pounds of VOC per hour, using dry filters to control particulate matter emissions, exhausting to one (1) stack, with one (1) cure oven exhausting to one (1) stack.
- (3) Two (2) spray booths identified as Spray Booth # 1 and Spray Booth # 2 each equipped with one (1) HVLP spray gun for painting, and the associated solvent cleaning and coating mixing operations, each with a maximum capacity 41.4 pounds of VOC per hour, each using dry filters to control particulate matter emissions and each exhausting to one (1) stack.
- (4) One (1) chop booth equipped with one (1) non-atomizing resin applicator and hand lay-up operations and the associated solvent cleaning operations, identified as the Main Glass Plant Chop Booth, with a maximum capacity to apply 437 pounds of neat resin per hour, using dry filters to control particulate matter emissions, and exhausting to two (2) stacks.

The ledge lamination area consisting of multiple ledge stations, one (1) non-atomizing resin applicator and hand lay-up operations and the associated solvent cleaning operations with a maximum capacity to apply 437 pounds of neat resin per hour with fugitive emissions.

- (5) One (1) gelcoat booth equipped with one (1) air assisted applicator and the associated solvent cleaning operations, identified as the Main Glass Plant Gel Coat Booth, with a maximum capacity to coat 118 pounds of fiberglass gel coat per hour, using dry filters to control particulate matter emissions, and exhausting to one (1) stack.
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- (7) Fiberglass truck cap adhesive application, identified as Adhesive Booth C with a maximum usage of 1.0 gallon of adhesive per hour using air-assisted airless spray system, with dry filters to control the particulate matter overspray emissions.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.
- (2) Tonneau cover adhesive application, identified as Adhesive Booth T with a maximum usage of 0.20 gallon per hour, using air-assisted airless spray system.
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- (5) Other activities of categories not previously identified:

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Nitrogen Oxides (NO<sub>x</sub>) = 5 lbs/hour or 25 lbs/day      Volatile Organic Compounds = 3 lbs/hour or 15 lbs/day

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- (f) Two (2) 6,000 capacity unsaturated polyester resin storage tanks
- (g) Two (2) 300 gallon capacity shear mixing tanks used to mix unsaturated polyester resin and calcium carbonate
- (h) One (1) 1,500 gallon capacity acetone storage tank
- (i) One (1) adhesive application spray area with two (2) stations to apply adhesive to tonneau covers
- (j) One (1) corrugating station used to hand cut cardboard and fiberglass mat for hand and spray lay-up operations and the bandsaw cutting of aluminum
- (k) One (1) gelcoat storage and mixing room
- (l) Less than 90 day storage of hazardous wastes containing VOC's and HAPs in closed containers
- (m) Metal strip cutting operation

- (n) Mold repair and maintenance operations
- (o) Aluminum truck cap painting
- (6) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000, 000) Btu per hour.
  - (a) One (1) propane-fired shrink wrap heat gun.
- (7) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
  - (a) One (1) 300 gallon capacity diesel fuel storage tank.
- (8) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.
  - (a) Air tool maintenance
  - (b) Compressor maintenance
- (9) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
  - (a) One (1) acetone recycling machine
- (10) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (11) Blowdown for any of the following: sight glass; boiler; compressors, pumps and cooling tower
  - (a) Blowdown for compressors
- (12) Grinding and machining operations controlled with filters scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grain per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
  - (a) Tonneau assembly area:
    - (A) Miscellaneous woodworking operations to cut shipping mounting boards
    - (B) One (1) combination grinding booth
  - (b) Main glass plant:
    - (A) One (1) combination grinding booth
    - (B) Miscellaneous woodworking operations to cut shipping mounting boards
  - (c) Paint building - Paint preparation scuff sanding room.
- (13) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).
  - (a) Main glass plant - Mold maintenance activities
- (14) A laboratory as defined in 326 IAC 2-7-1(20)(C)
  - (a) One (1) gelcoat and resin QA/QC laboratory

#### A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (1) One (1) paint/clear coat booth with one (1) air-assisted airless gun for clear coating and one (1) HVLP gun for painting, and the associated solvent cleaning and coating mixing operations, identified as Paint/Clear Booth # 3, with a maximum capacity of 41.4 pounds of VOC per hour, using dry filters to control particulate matter emissions, exhausting to two (2) stacks, with one (1) cure oven exhausting to one (1) stack.
- (2) One (1) paint/clear coat booth with one (1) air-assisted airless gun for clear coating, and the associated solvent cleaning and coating mixing operations, identified as Paint/Clear Booth # 4, with a maximum capacity of 41.4 pounds of VOC per hour, using dry filters to control particulate matter emissions, exhausting to one (1) stack, with one (1) cure oven exhausting to one (1) stack.
- (3) Two (2) spray booths identified as Spray Booth # 1 and Spray Booth # 2 each equipped with one (1) HVLP spray gun for painting, and the associated solvent cleaning and coating mixing operations, each with a maximum capacity 41.4 pounds of VOC per hour, each using dry filters to control particulate matter emissions and each exhausting to one (1) stack.
- (4) One (1) chop booth equipped with one (1) non-atomizing resin applicator and hand lay-up operations and the associated solvent cleaning operations, identified as the Main Glass Plant Chop Booth, with a maximum capacity to apply 437 pounds of neat resin per hour, using dry filters to control particulate matter emissions, and exhausting to two (2) stacks.

The ledge lamination area consisting of multiple ledge stations, one (1) non-atomizing resin applicator and hand lay-up operations and the associated solvent cleaning operations with a maximum capacity to apply 437 pounds of neat resin per hour with fugitive emissions.

- (5) One (1) gelcoat booth equipped with one (1) air assisted applicator and the associated solvent cleaning operations, identified as the Main Glass Plant Gel Coat Booth, with a maximum capacity to coat 118 pounds of fiberglass gel coat per hour, using dry filters to control particulate matter emissions, and exhausting to one (1) stack.
- (6) One (1) gel coat booth identified as Research and Development Gel Coat Booth and the associated solvent cleanup operations, using dry filters to control particulate matter emissions, and exhausting to one (1) fan. And one (1) chop booth identified as Research and Development Chop Booth and the associated solvent cleaning operations, using dry filters to control particulate matter emissions and exhausting to one (1) fan.
- (7) Fiberglass truck cap adhesive application, identified as Adhesive Booth C with a maximum usage of 1.0 gallon of adhesive per hour using air-assisted airless spray system, with dry filters to control the particulate matter overspray emissions.

### INSIGNIFICANT ACTIVITIES:

- (2) Tonneau cover adhesive application, identified as Adhesive Booth T with a maximum usage of 0.20 gallon per hour, using air-assisted airless spray system.
- (5) (a) One (1) combination booth (sanding operations and saw dust collectors)

## Emission Limitations and Standards [326 IAC 2-7-5(1)]

### D.1.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

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- (a) The total source potential to emit of VOCs are less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential to emit to 250 tons per year, from the equipment covered in this permit, shall require approval from OAQ pursuant to 326 IAC 2-2 and 40 CFR 52.21, before such change may occur.

### D.1.2 Volatile Organic Compounds (VOC) Emissions

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- (a) Pursuant to OP No. 039-0695-00076, issued on December 31, 1990, the use of gel coats, resins, cleanup solvents, and other materials containing VOCs delivered to the applicators of Spray Booth #1, Main Glass Plant Chop Booth, Main Glass Plant Gel Coat Booth, Research and Development Chop Booth, Research and Development Gel Coat Booth, one (1) adhesive booth and one (1) combination booth are limited, in total, to 14.8 tons per month (177 tons per year).
  - (1) Compliance with the above limits shall be determined based upon the following criteria:
    - (A) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques as approved by IDEM, OAQ for each gel coat and resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAM.
    - (B) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998, or its updates. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent basis.
- (b) Pursuant to the Registration Permit issued on October 25, 1990, the potential VOC emissions for Spray Booth #2 are less than twenty-five (25) tons per twelve (12) consecutive months.
- (c) Pursuant to RP No. 039-2323-00076, issued on January 28, 1992, the potential VOC emissions for Paint/Clear #4 are less than twenty-five 25 tons per twelve (12) consecutive months.
- (d) Pursuant to RP No. 039-3273-00076, issued on November 29, 1993, the potential VOC emissions for Paint/Clear #3 are less than twenty-five 25 tons per twelve (12) consecutive months and Paint/Clear #3 is limited to painting 36 units per day.



- (e) Any change or modification which may increase the potential emissions from Spray Booth #2, Paint/Clear #3, or Paint/Clear #4 to 25 tons per year or more must be approved by the Office of Air Quality before such change may occur.
- (f) The fiberglass truck cap adhesive application has a potential VOC emissions of less than 25 tons per year. Therefore, 326 IAC 8-1-6 (General Reduction Requirements) is not applicable. However, any change or modification which may increase potential VOC emissions to 25 tons per year or more shall be subject to 326 IAC 8-1-6, and must be approved by the Office of Air Quality before such change may occur